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March 22, 2018

VIA ECF

Hon. Richard J. Sullivan
United States District Judge
40 Foley Square
New York, NY 10007

Re: Griffin, et. al. v. Sheeran, et. al., No. 17-cv-5221(RJS)

Dear Judge Sullivan:

We are counsel to the Defendants in the above-referenced action. At the request of Plaintiffs' counsel, we write to Your Honor to request one further extension of time, until April 27, 2018, to complete the depositions of plaintiff Kathryn Townsend Griffin, plaintiff Helen McDonald and defendant Atlantic Recording Corporation.

On March 13, 2018, the Parties jointly requested a 13-day extension to complete fact discovery (from March 15, 2018 until March 28, 2018), and advised that the depositions would be conducted on March 23, 2018. Unfortunately, on Tuesday evening, March 20, 2018, Plaintiffs' counsel contacted us and advised that, due to the impending snowstorm, their flights had been cancelled and they were unable to reschedule their flights for after the storm passed. Further, they have advised that the earliest date they and their clients will be available to travel to New York again is the week of April 23.

Accordingly, the Parties respectfully request that the Court extend the deadline to complete the aforementioned depositions until April 27, 2018. The existing deadlines for all other discovery shall remain the same.

Respectfully submitted,

/s/ Donald S. Zakarin

cc: Counsel of Record (via ECF)